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10 Fire and Casualty Company parent of
11 State Farm Mutual Automobile Insurance Company

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 RIVERPORT INSURANCE COMPANY,
15 Plaintiff,

16 vs.

17 STATE FARM FIRE AND CASUALTY
18 COMPANY, parent of STATE FARM
19 MUTUAL AUTOMOBILE COMPANY

20 Defendants.

21 CASE NO.: 2:18-CV-00330-GMN-NJK

22 **STIPULATION AND ORDER TO EXTEND
23 TIME TO FILE MOTIONS (First Request)
24 and TO PRODUCE UNDERWRITING FILE
(First Request)**

25 Defendant, State Farm Fire and Casualty Company, erroneously named as “parent of State Farm
26 Mutual Automobile Insurance Company” (“State Farm”) and Plaintiff, Riverport Insurance Company
27 (“Riverport”) (hereinafter referred to collectively as the “Parties”), hereby submit the instant Stipulation
and Order To Extend Time to File Motions (First Request) and To Produce Underwriting File (First
Request). This is the Parties’ first stipulation for an extension of time for Riverport to file its
Opposition to State Farm’s Motion for Summary Judgment re: Riverport’s Claims For Equitable
Indemnity, Equitable Subrogation, and Equitable Contribution (ECF No. 22), which is currently due on
December 17, 2018; and the first stipulation for an extension of time for State Farm to produce its
underwriting file, which is currently due by December 20, 2018, pursuant to the Court’s December 6,
2018 Order (ECF No. 29) granting Riverport’s Motion to Compel (ECF No. 21).

28 Although State Farm is diligently attempting to comply with the Court’s Order (ECF No. 29), the

1 holiday schedule and associated pre-arranged absences of personnel preclude State Farm from ensuring
2 timely production of the materials by December 20, 2018. Accordingly, the Parties hereby stipulate to
3 extend the deadlines for State Farm's production of the underwriting file, and for Riverport's Opposition
4 to State Farm's Motion for Summary Judgment re: Riverport's Claims For Equitable Indemnity,
5 Equitable Subrogation, and Equitable Contribution (ECF No. 22), which may reference materials from
6 the underwriting file, as follows:

- 7 1) The underwriting file originally to be produced by State Farm by December 20, 2018
8 pursuant to the Court's Order (ECF No. 29) granting Riverport's Motion to Compel (ECF
9 No. 21), is to be produced by December 28, 2018;
- 10 2) Riverport's Opposition to State Farm's Motion for Summary Judgment re: Riverport's
11 Claims For Equitable Indemnity, Equitable Subrogation, and Equitable Contribution
12 (ECF No. 22), originally due on December 17, 2018, is now due on December 31, 2018;
13 and
- 14 3) State Farm's Reply is due 14 days after service of Riverport's Opposition unless the
15 Court orders otherwise pursuant to LR II 7-2.

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1 The Parties submit that the foregoing extensions are requested in good faith, jointly by the
2 Parties, and not for the purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 12th day of December, 2018.

5 HALL JAFFE & CLAYTON, LLP

6 DATED this 12th day of December, 2018.

7 THE FELDMAN FIRM

8 By: /s/ Kathy A. McCarthy

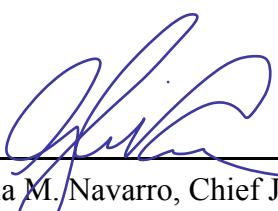
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21 *Attorneys for Plaintiff*

22 **IT IS SO ORDERED.**

23 Dated this 13 day of December, 2018.

24 
25 Gloria M. Navarro, Chief Judge
26 UNITED STATES DISTRICT COURT